



Conflict Minerals Statement

Minerals and metals originating from conflict-affected and high-risk areas may be associated with the risk of significant adverse impacts, specifically minerals and metals from – but not limited to – the Democratic Republic of the Congo (DRC) and adjoining countries,¹ and other regions where the presence of armed conflict, widespread violence, systematic violations of national and international law, including severe human rights abuses are frequent.

Cassiterite, columbite-tantalite (coltan), wolframite, and their derivatives tin, tantalum and tungsten, and gold – or “3TG” – which come from such areas are referred to as “conflict minerals”. Cobalt, although not a “conflict mineral”, is also associated with adverse human rights impacts. These minerals and metals are commonly used in the consumer electronics industry to which the devices in our Reduced Risk Products category (RRP) belong.

JTI does not directly purchase any minerals and metals from any source and is far removed from the mines, smelters and refiners that produce the metals contained in our products. We source devices and components that contain very small amounts of minerals and metals compared to the global consumption in the electronic industry.

JTI’s commitment to respect human rights is notably formalized through our [Code of Conduct](#), [JT Group Human Rights Policy](#) and [JTI’s Human Rights Commitment](#). JTI remains committed to conducting its business responsibly and will seek to ensure the minerals and metals contained in our devices have been responsibly sourced. JTI commits it will not do business with suppliers which we find, in particular but not limited, to:

- benefit from, contribute to, assist with or facilitate the commission by any party of:
 - (i) any forms of torture, cruel, inhumane or degrading treatment;
 - (ii) forced or compulsory labor;
 - (iii) the worst forms of child labor;
 - (iv) other gross human rights violations and abuses such as widespread sexual violence; or
 - (v) war crimes or other violations of international humanitarian law, crimes against humanity or genocide.

¹ As defined in the Section 1502 of the US Dodd-Frank Wall-Street Reform and Consumer Protection Act, the term “adjoining country”, with respect to the Democratic Republic of the Congo, means a country that shares an internationally recognized border with the Democratic Republic of the Congo, namely: Angola, Burundi, Central African Republic, Republic of Congo, Rwanda, Sudan, Tanzania, Uganda and Zambia.



- provide direct or indirect support to non-state armed groups through the extraction, transport, trade, handling or export of minerals and metals, nor those who provide direct or indirect support to public or private security forces who illegally control mine sites, transportation routes and upstream actors in the supply chain; or
- are engaged in bribery and corruption or other financial crime or violate (directly or indirectly) international sanctions or export control laws.

With a view to identifying, assessing and mitigating the risks associated with conflict minerals and monitoring the effectiveness of our interventions, we notably:

- conduct due diligence of our upstream supply chain aligned to the five-step approach set out in the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.
- contractually require of our suppliers to share our commitment to the responsible sourcing of minerals and metals used in our RRP devices. JTI is working with its suppliers to increase awareness and build capacity on the steps necessary to increase the transparency on the origin of minerals and metals, and help ensure they are procured through conflict-free sources.
- participate in and support industry organizations that seek to identify and prevent or mitigate the adverse impacts associated with mineral extraction. We are a member of the Responsible Business Alliance (RBA) – the world's largest industry coalition dedicated to corporate social responsibility in global supply chains.
- leverage the Responsible Minerals Assurance Process (RMAP), the Responsible Minerals Initiative's industry-level smelters and refiners audit program. We use RMAP to help assess whether metals are sourced from facilities that meet the requirements of OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas; and
- have established a dedicated RRP sourcing team that sources components and devices to support business expansion and meet the demands of our increasingly sophisticated portfolio.

Your Voice is JTI's main mechanism for reporting concerns. JTI welcomes submissions of concerns as part of its commitment to respect human rights, identify risks and impacts related to significant human rights considerations across JTI's operations, engage with stakeholders, and continuously improve its systems and processes. JTI ensures access to *Your Voice*, either via a secure [portal](#) run by an independent provider, accessible 24/7 worldwide and in more than 75 languages with a computer or phone, or via the dedicated email address onebehaviour@jti.com.

Every reported concern is recorded and treated confidentially. All substantiated instances of misconduct are addressed appropriately, and retaliation against anyone reporting a concern is not tolerated.

JTI will continue to monitor global developments and regulatory requirements or standards related to the responsible sourcing of other minerals and metals globally and will update its policies and practices accordingly.



References:

JTI Code of Conduct: [JTI Code of Conduct – One Team. One Conduct](#)

JT Group Human Rights Policy: [JT Group Human Rights Policy](#)

JTI Human Rights Commitment: [iti-human-rights-commitment.pdf](#)

OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas: www.oecd.org/corporate/mne/mining.htm

Responsible Business Alliance: www.responsiblebusiness.org

Responsible Minerals Initiative: www.responsiblemineralsinitiative.org
